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MR. JEFFERY ALONZO SIMMS #198625

(plaintiff)

v.

(defendants)

ORIGINAL

CIVIL ACTION NO. 04-941-SLR

\*\*\*\*\*  
AND CIVIL ACTION NO. 04-1205-SLR

DATE JULY 19-2005

I.D. 198625

R.L. HUGHES RET. MAJOR, LT. COL. NOW MAJOR  
THOMAS F. MACLEISH, COL. L. AARON CHAFFINCH  
(DELAWARE STATE POLICE 1441 N. DUPONT  
HWY. DOVER, DELAWARE 19901

MR. RALPH K. DURSTEIN 111

DEPARTMENT OF JUSTICE 820 N. FRENCH  
STREET 6th FLOOR WILMINGTON, DELAWARE  
19801

(defendants)

HARRY M. FREEMAN M.D. PH. d, ORTHOPEDIC  
SURGEON 808 MIDDLEFORD ROAD  
SEAFORD, DELAWARE 19973.

DOCTOR DONNA BURNS BURNS P.H.d, M.D.

(WORK PLACE) SUSSEX CORRECTIONAL

INSTITUTION P.O. BOX 500

GROGEGTOWN, DELAWARE 19947.

(RET. MAJOR R.L. HUGHES DEL STATE POLICE)

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WILSON V. SEITER, 501 U.S. 294  
, 111 S. CT. 2321, 115 L. ED  
. 2d 271 (1991)  
HELLING V. MCKINNEY, 509 U.S.  
25, 113 S. CT. 2475, 125 L. ED.  
2d 2d 22 (1993) : LAAMAN V.  
HELGEMOE, 437 F. SUPP. 269,  
312 (D.N.H. 1977)

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FILED
JUL 25 2005
U.S. DISTRICT COURT DISTRICT OF DELAWARE

NOTICE OF MOTION

PLEASE TAKE NOTICE OF THE ENCLOSE MOTION FOR EMERGENCY RELIEF

WHILE IN A STATE INSTITUTION OF CORRECTION IN THE STATE OF DELAWARE  
WITH A STATEMENT OF CLAIMS AND CERTIFICATE OF SERVICE HERETO: WILL  
BE PRESENTED TO THIS HONORABLE COURT AT THE EARLIEST URGENT POSSIBLE  
DATE.

FOURTEENTH AMENDMENT :

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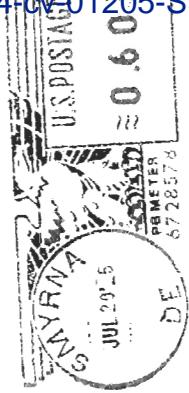
UNDER FEDERAL OF THE UNITED STATES OF AMERICA:

1. a ) COMMISSION ON ACCREDITATION FOR CORRECTION,  
CERTIFICATION STANDARDS FOR HEALTH CARE PROGRAMS HC -058(1989).

2. b) UNITED STATES DEPT OF JUSTICE, FEDERAL STANDARDS FOR CRIMINAL  
JUSTICE §§ 23.5 -1, 5-2 (1986): (FOR PRISON AND JAILS §§ 5.22-24)  
(1980)

CORRECTIONAL HEALTH CARE, ABA STANDARDS FOR CRIMINAL JUSTICE  
J-20-21(1987), NATIONAL COMMISSION ON CORRECTIONAL HEALTH CARE,  
STANDARDS FOR HEALTH SERVICES IN JAILS J-44(MAY1999)

*Jeffery Alonzo Simms*



IM Jeffrey A. Davis

SBI# 192625 UNIT K-D-3 east  
DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

U.S.M.S.  
X-RAY

Attn: Judge Sue L. Robinson  
United States District Court  
844 N. King Street, 18th Flr  
Honorable Judge Thomas R. Ambros  
Fifth Floor Building Wilmington Delaware  
19801-3370

19801-3370